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6 DISTRICT NO. 40

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

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COUNTY WATERWORKS DISTRICT NO. 40

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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
16

17 **ANTELOPE VALLEY**
18 **GROUNDWATER CASES**

19 Included Actions:
20 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
21 Court of California, County of Los
Angeles, Case No. BC 325201;

22 Los Angeles County Waterworks District
23 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
No. S-1500-CV-254-348;

24 Wm. Bolthouse Farms, Inc. v. City of
25 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
27 RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

OBJECTION TO NOTICE OF DEPOSITION
OF COUNTY OF LOS ANGELES

Date: April 19, 2013
Time: 9:00 a.m.

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:


2 Los Angeles County Waterworks District No. 40 ("District No. 40") hereby objects to the
3 Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc., notice of deposition of the person
4 most knowledgeable of Los Angeles County and to the requests for production of documents in
5 the notice of deposition, on the grounds that the County of Los Angeles is not a party. District
6 No. 40 further objects to the deposition notice to the extent that the identified topics of testimony
7 and requests for production of documents are vague and ambiguous, overly broad or unduly
8 burdensome, or not relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence. District No. 40 further objects to the extent the requested testimony or documents seek
10 to invade the attorney-client privilege, deliberative process privilege, and/or attorney work
11 product doctrine.

12 District 40 further objects on the grounds that the deposition notice and corresponding
13 document production requests are duplicative to the deposition notice and document production
14 requests for District No. 40 witness Adam Arika (whose deposition went forward on April 12,
15 2013) and, therefore, the notice and requests seek improper discovery in violation of the
16 Discovery Act and are harassing.

17 Dated: April 17, 2013

BEST BEST & KRIEGER LLP

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20 By


ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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PROOF OF SERVICE

I, Kerry V. Keefe, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California, 92614. On April 17, 2013, I served the within document(s):

OBJECTION TO NOTICE OF DEPOSITION OF COUNTY OF LOS ANGELES

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 17, 2013, at Irvine, California.


Kerry V. Keefe